

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE**

NASHVILLE DIVISION

**FEMHEALTH USA, INC., d/b/a
CARAFEM,**

Plaintiff,

v.

RICKEY NELSON WILLIAMS, JR.;

BEVELYN Z. WILLIAMS;

EDMEE CHAVANNES;

AT THE WELL MINISTRIES, INC.

Defendants.

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MAY 02 2024

**U.S. District Court
Middle District of TN**

Civil Action No. 3:22-cv-00565

JUDGE CAMPBELL

MAGISTRATE FRENSLEY

ANSWER TO AMENDED COMPLAINT

This response addresses the amended complaint filed against defendants Rickey Williams, Bevelyn Williams, and Edmee Chavannes. The objections raised stem from the lack of evidence supporting the accusations, misinterpreted context, hearsay, irrelevant details, and unfounded claims purported by the plaintiff. After carefully

reviewing the complaint, the defendants are appalled that Carafem would even submit such a document to the courts. They find it to be an insult to the American judicial system and a waste of the court and judge's valuable time. What's stated in the complaint shows how offended Carafem is. It is a desperate attempt for the plaintiff to exploit the FACE Act thereby restricting freedom of speech. The FACE Act was in part voted into law to protect against acts of violence from individuals who want to end the murder of children. On paper, this law was not enacted to limit free speech or cater to businesses that feel "intimidated" by loud prayer. Furthermore, it will be revealed during discovery that Carafem no longer offers surgical abortions and only provides virtual visitations. In other words, Carafem is not even operational. The defendants protested against Carafem solely due to their involvement in the termination of pregnancies in the aftermath of Roe V Wade being overturned in 2022. In the state of Tennessee, abortion is now completely illegal, rendering the defendants with no reason or justification to be concerned with Carafem. As residents of the state, the defendants have the right to express their opinions on abortion. Since they reside in a state that aligns with their Biblical views when it comes to abortion, Carafem is irreverent.

RESPONSE TO LISTED COMPLAINTS

1. ****Objections of Relevance**** Line 19-26 statement is irrelevant to Rickey Williams, Bevelyn Williams, and Edmee Chavannes. The defendants were not in attendance.
2. ****Objections of Relevance**** Line 27-29 statement is irrelevant to Rickey Williams, Bevelyn Williams, and Edmee Chavannes. The parties were not present, not involved, nor aware of the situation mentioned.
3. ****First Amendment Protections**** - ****Lack of Sound Ordinance**** Regarding line 30; there was no sound ordinance for the public sidewalk. Also, signs are considered as a form of freedom of speech. **** Legal Statutes**** The First Amendment to the United States Constitution protects the right to free speech, including peaceful assembly and the display of signs as a form of expression. This protection extends to public sidewalks, which are traditionally considered public forums where speech is highly protected [10]. **** Legal Statutes**** legal context provided by the Tennessee Administrative Code, Tennessee Code, and Tennessee Court Rules supports the broad protections of free speech, including on university properties and other public forums, with specific guidelines on time, place, and manner restrictions that do not infringe upon the First Amendment rights [4][8][9][12]. These protections ensure that individuals and groups can engage in expressive activities, including protests, as long as they comply with applicable laws and regulations. ****Hearsay Objections**** line 13-30 claims of

having to speak over protesters and claims of threats through megaphone are completely unfounded. Carafem was operating from the 2nd floor of a multi-business building located 30 feet away from the sidewalk. Why did Carafem assume they were targeted? Could it be because they are in the business of murdering children? "Interfere with" means to restrict a person's freedom of movement.

4. ****Legal Basis**** regarding line 31 Rule 402 of the Federal Rules of Evidence, which states that irrelevant evidence is not admissible; City Hall and Carafem are two totally different locations. Also ****First Amendment Protections**** - the activities in question are protected forms of expression under the First Amendment. ****Signs as Freedom of Speech**** rallies and gatherings are protected by the first amendment. ****Association with Specific Groups**** - Rickey Williams, Bevelyn Williams, and Edmee Chavannes are not "close" associates of OSA. Parties just have the same beliefs regarding abortion.
5. ****False Claims**** regarding line 32; Rickey Williams, Bevelyn Williams, and Edmee Chavannes operate from a separate entity, At the Well Ministries, Inc. ****Legal Analysis**** There is a severe lack of legal evidence of membership or association with OSA.
6. ****Addressing Partial Truths and Context**** defendants Rickey Williams, Bevelyn Williams and Edmee Chavannes did go to the second floor seeking permission to enter the clinic as the front door is a buzz lock entrance. ****Partial Truths and False Claims**** Although the other half of the complaint is false. The defendants did not block the door entrance, nor was there anyone attempting to go in or out within the defendants' purview.
7. ****True Statement****, regarding line 34; defendants did seek to gain permission to enter the clinic's office but was denied entry.
8. ****Out of Context Statements**** regarding line 35; defendant Bevelyn Williams' statements were taken out of context. Discovery will show that her statements were based off of spiritual "prayer" and proclamation, not physical threats. Nor is there any proof showing an attempt to physically execute alleged "threats".
9. ****Sustained**** line 36.
10. ****True Statement**** regarding line 37; Rickey Williams, Bevelyn Williams, and Edmee Chavannes were requested to leave the premises by the police or be arrested for trespassing. The defendants complied and were escorted out without arrest.
11. ****False Claim**** regarding line 38; the patient chose to hide unbeknownst to the defendants. They were unaware that there was an alleged patient who was trying to enter the clinic. It was supposedly later that the clinic found out about her and how she chose to hide on her own volition. If the defendants had known that the purported patient was present, they would have no control over her decision to

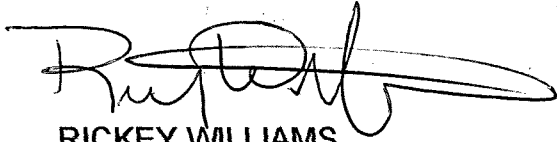
hide. In her attempt to enter the clinic, defendants would not have obstructed her entry. She claimed in her own statement that she remained unseen, which confirms the defendants' stance. "Physical obstruction" means rendering ingress to or egress from a reproductive health services facility impassable to another person or rendering passage to or from a reproductive health services facility unreasonably difficult or hazardous to another person.

12. ****False Claim**** regarding line 39; not a factual statement that this was directly caused by the accused party.
13. ****Partial Truths**Claim Sustained**** regarding lockdown in line 40, line 19 is irrelevant regarding Rickey Williams, Bevelyn Williams and Edmee Chavannes who left premises immediately after being escorted out by police. They were nowhere near the vicinity.
14. ****Irrelevant Claims****: regarding line 41; protesting at Planned Parenthood has nothing to do with Carafem. Two separate locations, times and situations.
15. ****Sustained**** line 42.
16. ****Defendants Plea**** regarding line 43; Rickey Williams, Bevelyn Williams, and Edmee Chavannes plead not guilty.
17. ****Defendants Plea**** regarding line 44; Rickey Williams, Bevelyn Williams, and Edmee Chavannes plead not guilty.
18. ****No Comment**** line 45.
19. ****Objections of Relevance**** regarding lines 46-51; irrelevant to party.
20. ****Sustained**** line 52.
21. ****False Claims**** regarding line 53; the building is not a medical building. It is a multi-business industrial zoned building servicing many businesses. As mentioned in line 34, Rickey Williams, Bevelyn Williams, and Edmee Chavannes requested entry and were denied. They never entered Carafem's offices.
22. ****False Claims**** regarding line 54; defendants Rickey Williams, Bevelyn Williams, and Edmee Chavannes were asked to leave by the police and complied.
23. ****False Claims**** regarding line 55; the police requested that the defendants leave and escorted them off of the property. The defendants were not arrested for trespassing.
24. ****False Claims**** regarding line 56; these hearsay statements regarding mental and emotional suffering cannot be proven to directly correlate with Rickey Williams, Bevelyn Williams, and Edmee Chavannes' freedom to protest and the exercise thereof. "Intimidate" means to place a person in reasonable apprehension of bodily harm to herself or himself or to another.
25. ****Sustained**** line 57.

26. ****False Claims**** regarding line 58 is denied. Rickey Williams, Bevelyn Williams, and Edmee Chavannes did not attempt to invoke fear or intimidate staff but endeavored to bring awareness as to the murdering of children and the role "Carafem Child Termination Offices" play in the matter.
27. ****Freedom to Expression of Religion and Speech - First Amendment Protections**** regarding line 59 is denied. Defendants Rickey Williams, Bevelyn Williams, and Edmee Chavannes' "aggressive yelling", "speaking in tongues," & "aggressive hand gestures", must be proven as a direct physical and deliberate threat to the plaintiff. Carafem "feeling intimidated" has no ****Legal Basis****
28. ****Hearsay and Irrelevant Claims**** Rule 802 of the Federal Rules of Evidence, which generally prohibits the admission of hearsay ****Hearsay Objections**** regarding line 60; the defendants were not aware of any patient being present because the "patient" chose to remain unseen, purposefully as stated in line 38. Defendants have no special abilities to see through walls. The patient has only been identified for the purpose of this case.
29. ****Objections of Relevance**** Line 61-63 irrelevant.
30. ****Sustained**** Line 64.
31. ****Reference**** Claim is denied by defendants Rickey Williams, Bevelyn Williams, and Edmee Chavannes, please refer to lines 7,10,11, and 13.
32. ****Hearsay Objections ** - ** False Claim**** line 66 claim is denied. There was no direct intimidation, but hearsay based on an alleged patient's claim. The defendants were completely unaware of the patient's alleged presence as she remained "unseen."
33. ****No Comment**** line 67.

We respectfully request that the Federal Courts of Tennessee dismiss this case. We firmly believe that the resources of the judicial system should be allocated to more significant matters. As per the soon to come discovery, it is evident that Carafem was no longer welcomed in Mount Juliet and was even compelled by the courts to operate in industrial locations, which limited their ability to perform abortions. It is the defendant's fair assessment that their freedom to protest allowed them to express sentiments shared by the local community. With the Tennessee Congress having attentively listened to their constituents, there is no longer a need for the defendants to raise their concerns regarding the issue of abortion locally. Rickey Williams, Bevelyn Williams, and Edmee Chavannes firmly believe that this is a time to peacefully live in the great state of Tennessee, enjoy the benefits of their hard work and witness the growth and prosperity of their community.

APPROVED FOR ENTRY:



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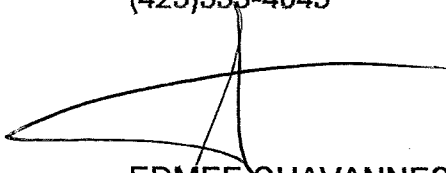
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